## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF ILLINOIS

IN RE: CHRISTOPHER & SANDRA KINKELAAR	)	Case No: 15-60304
	)	Chapter 13
	)	
Debtor(s).	)	

## MOTION FOR DISCHARGE

Now comes the Debtor(s), CHRISTOPHER & SANDRA KINKELAAR, by and through their undersigned attorney and for their motion states as follows:

- 1. That the Debtors filed their Chapter 13 case on March 27, 2015.
- 2. That Trustee Russell Simon filed a Report of Plan Completion, Request for Termination of Wage Order and Notice Concerning Discharge on September 26, 2018.
- 3. The Debtors have completed their payments under the Chapter 13 plan and the other duties that were required.
- 4. The Debtors were under an obligation to make direct payments on their mortgage and Debtors certify that they are current in that obligation.
- 5. The Debtors were not under an obligation to pay any domestic support.
- 6. The Debtors have completed the personal financial management course and have filed a certificate so indicating.

WHEREFORE, Debtors pray that this Honorable Court grant the Debtors a discharge in their Chapter 13 bankruptcy; terminate any wage orders and for such other relief as this Court deems just and necessary.

## RESPECTFULLY SUBMITTED,

By: \_\_/s/J.D. Graham J.D. Graham 06211732 J.D. GRAHAM, PC. #1 Eagle Center; Suite 3A O'Fallon, IL 62269 618.235.9800 618.235.9805 fax jd@jdgrahamlaw.com

## **CERTIFICATE OF SERVICE**

Comes now Debtors, CHRISTOPHER & SANDRA KINKELAAR, by and through their attorney, and certifies that on October 12, 2018, via first-class mail, postage prepaid, a true and accurate copy of the Motion for Discharge was served upon the following people that were not served electronically:

/s/ Meghan Csontos

Russell Simon Chapter 13 Trustee 24 Bronze Pointe Swansea, IL 62226

U.S. Trustee Becker Building, Ste. 1100 401 Main St. Peoria, IL 61602

Christopher & Sandra Kinkelaar 19418 N 1300<sup>th</sup> St Effingham, IL 62401

All creditors listed on mailing matrix.